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**OIL CONSERVATION  
DIVISION STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION  
FOR THE PURPOSE OF CONSIDERING:**

**APPLICATION OF SAMSON RESOURCES  
COMPANY FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**Case No. 13130**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Samson Resources Company as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Samson Resources Company  
Suite 1170  
200 North Lorraine  
Midland, Texas 79701

Attention: Peggy Kerr  
(432) 683-7063

**APPLICANT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an order pooling all mineral interests from the surface to the base of the Morrow formation underlying Lots 9, 10, 15, 16, and the SE¼ of Section 4, Township 16 South, Range 27 East, NMPM to form a standard 320-acre gas spacing and proration unit for any and all formations and/or pools developed on 320-acre spacing within that vertical extent, including but not limited to the Undesignated Diamond Mound-Wolfcamp Gas Pool, Undesignated Diamond Mound-Atoka Gas Pool, and Undesignated Diamond Mound-Morrow Gas Pool. The unit will be dedicated to applicant's Banshee "4" Fed. Com. Well No. 1, to be drilled at an orthodox location in Lot 16 (Unit P) of Section 4. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a charge for the risk involved in drilling and completing the well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

Peggy Kerr  
(landman)

EST. TIME

10 min.

EXHIBITS

1. Land plat
2. Correspondence
3. AFE
4. Notice affidavit

\_\_\_\_\_  
(geologist)

15 min.

1. Structure map
2. Isopach
3. Cross-section

\_\_\_\_\_  
(engineer)

10 min.

1. Economics data

OPPONENT

WITNESSES

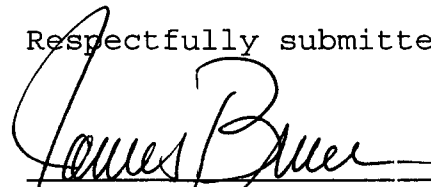
EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Samosn Resources Company